

UNITED STATE DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

v.

Case No. 23-MJ-00865 (JMW)

QIN HUI (a/k/a “Hui Qin”, “Hui Quin”,  
“Muk Lam Li”, and “Karl”,

Defendant.

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**DECLARATION OF JOHN S. ESPOSITO, ESQ.**

1. My name is John S. Esposito. I am a partner at the firm Aidala, Bertuna & Kamins, P.C. I am admitted to practice in the State of New York and before this Court.

2. I make this declaration in support of my motion, which will include my firm’s partners, Arthur L. Aidala, Michael T. Jaccarino and Imran H. Ansari, to withdraw and be relieved of representing the defendant in the above captioned matter and as counsel of record for defendant Qin Hui.

3. I am making this application as a result of being informed by Benjamin B. Xue of Xue & Associates, P.C., who is current counsel for defendant, that the defendant has discharged this firm from representing him in the above case.

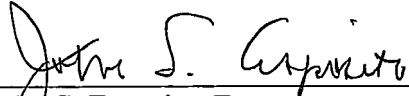
4. Mr. Xue confirmed his representation to my firm and further in his Notice of Appearance and Substitution of Counsel.

5. I am not asserting any retaining or charging lien.

6. I am causing this motion, including all of the papers submitted with the motion, to be served on all parties and Mr. Hui.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed: January 11, 2024  
New York, New York

  
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